

3. By way of its Reconsideration Motion, Plaintiff requests that the Court vacate the April 15, 2022 Order dismissing Plaintiff's Amended Complaint [ECF No. 172] and revisit

Plaintiff's contention that the claims asserted in its Amended Complaint are "related to" the bankruptcy proceeding filed by debtor PB Life and Annuity Co., Ltd. ("PBLA" or the "Debtor").

4. Hutchison respectfully references and incorporates the opposition arguments contained within the opposition submissions of Hutchison's codefendants [ECF No. 176, 177, 178, 179].

5. "Reconsideration of a previous order is an 'extraordinary remedy to be employed sparingly in the interests of finality and conservation of scarce judicial resources.' " *Mallet v. Miller*, 438 F. Supp. 2d 276, 277 (S.D.N.Y. 2006), quoting *In re Health Mgmt. Sys. Inc. Sec. Litig.*, 113 F. Supp. 2d 613, 614 (S.D.N.Y. 2000). "The standard for granting such a motion is strict, and reconsideration will generally be denied unless the moving party can point to controlling decisions or data that the court overlooked – matters, in other words, that might reasonably be expected to alter the conclusion reached by the court." *Shrader v. CSX Transp., Inc.*, 70 F.3d 255, 257 (2d Cir. 1995).

6. It is respectfully submitted that here, Plaintiff has failed to meet the strict standard for relief on a motion for reconsideration, and that its motion must therefore be denied.

Pursuant to 28 U.S.C. § 1746, I declare, under the penalty of perjury, that the foregoing is true and correct to the best of my knowledge, information, and belief.

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